**ATTORNEY DOCKET NO. KRAMER 2-1-3** **PATENT**

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

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| In re Application of: | David B. Kramer, *et al.* |
| Serial No.: | 10/044,185 |
| Filed: | January 9, 2002 |
| For: | A NON-BLOCKING CROSSBAR AND METHOD OF OPERATION THEREOF |
| Group No.: | 2461 |
| Examiner: | Jason E. Mattis Confirmation No: 9779 |

Mail Stop Appeal Brief-Patents

I hereby certify that this correspondence is being electronically filed with the USPTO on:

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/Elizabeth Schumacher/
(Signature of the person signing the certificate)

Sir:

**APPELLANTS' REPLY BRIEF UNDER 37 C.F.R. §41.41**

In response to the Examiner's Answer electronically delivered May 09, 2011 (hereinafter "Examiner's Answer"), the Appellants submit this Reply Brief as required by 37 C.F.R. §41.41.

## I. Reply to Examiner's Arguments

In the Examiner's Answer, the Examiner argues that: (1) the terminology of *an output having n crossbar switches* does not mean that the n crossbar switches are in the output; and (2) that Reches teaches a switch having n inputs, n outputs, and n crossbar FIFOs in each of the n outputs, with each of the n crossbar FIFOs interposing a corresponding one of each of the n inputs (asserting that n crossbar switches are "owned" by an output). (*See, e.g.*, pages 14-16 of the Examiner's Answer.) The Appellants respectfully disagree with both of these arguments.

Fig. 1 of Reches teaches separate input ports (10-19), a common configurable switch unit (50), and separate output ports (61-69). Paragraph [0052] of Reches teaches that "each output port can have at least one output queue." Paragraph [0052] of Reches does NOT teach that "each output port can have at least one output queue AND queues 21-29." On the contrary, Fig. 1 of Reches is specific in teaching that queues 21-29 are in each of the input ports 10-19. Thus, Reches does not teach that each output port has n crossbar switches but, on the contrary, Reches explicitly teaches that each input port has the n crossbar switches. As such, Reches does NOT teach the claimed limitation that each output has n crossbar switches.

The Examiner asserts, as noted above, that Reches teaches that each of the n crossbar FIFOs interposes a corresponding one of each of n inputs, and a destination FIFO of an output, as recited in the pending independent claims. Fig. 1 of Reches teaches that queues 21-29 (equated to the n crossbar switches) interpose a destination FIFO (the above noted at least one output queue) and only one input. In Fig. 1, queues 21-29 only interpose the middle input and output queue of output port 62. Correspondingly, the queues of input port 10 only interpose the input to input port 10 and an output queue of output port 61. Likewise, the queues of input port 19 only interpose the input to

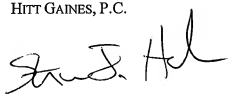
input port 19 and an output queue of output port 69). However, the queues 21-29 do not interpose a corresponding one of each of n inputs and the output port 62 as the Examiner asserts since, as established above, the queues 21-29 only interpose one of the n inputs (the middle one) and output port 62. Fig. 1 of Reches does NOT teach that any of the queues 21-29 interpose output port 62 and the input to input port 10 or the input to input port 19. Thus, Fig. 1 of Reches does NOT teach that each of the n crossbar FIFOs interposes a corresponding one of each of n inputs and a destination FIFO of an output as recited in the pending independent claims.

## II. Conclusion

For the reasons set forth above, pending Claims 1-20 are patentably non-obvious over Reches in view of Fan (and Fan and Hartmann), as applied by the Examiner. Accordingly, the Appellants respectfully request that the Board of Patent Appeals and Interferences reverse the Examiners Final Rejection of all of the Appellants pending claims.

Respectfully submitted,

HITT GAINES, P.C.



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Dated: July 7, 2011

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